

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

INDICTMENT FOR THEFT OF GOVERNMENT MONEY

UNITED STATES OF AMERICA

*** CRIMINAL DOCKET NO.**

v.

*** SECTION:**

LORETTA PAZON

*** VIOLATION: 18 U.S.C. § 641**

*** * ***

The Grand Jury charges that:

COUNT 1

A. AT ALL MATERIAL TIMES HEREIN:

1. Beginning in or about September 1964, due to the death of her husband, Ida Brown (“Brown”) began receiving monthly survivor benefit payments from the Social Security Administration, a department or agency of the United States, pursuant to Title II of the Social Security Act of 1935, 42 U.S.C. §§ 301 *et seq.*

2. Since on or about June 1999, these survivor benefit payments were directly deposited into a Capital One checking account, owned by Brown, established and located in New Orleans, Louisiana, in the Eastern District of Louisiana.

3. Sometime prior to February 2003, Brown's daughter, the defendant, **LORETTA PAZON** ("PAZON") was added to Brown's Capital One checking account, located in the Eastern District of Louisiana, where Brown's monthly survivor benefit payments were being deposited.

4. On or about February 6, 2003, Brown died. Because the defendant, **PAZON**, failed to inform the Social Security Administration of Brown's death, the monthly survivor benefit payments continued to be deposited in the Capital One checking account in the Eastern District of Louisiana, shared by Brown and **PAZON**.

5. From on or about February 2003 through on or about August 2007, **PAZON** continued to receive, have access to, and utilize the monthly survivor benefit payments, deposited in the Capital One checking account located in New Orleans, Louisiana, that were intended for Brown. **PAZON** utilized these monthly benefit payments for, among other things, payment of her personal bills and expenses.

6. Had the defendant, **PAZON**, disclosed Brown's death in February 2003 to the Social Security Administration, the monthly survivor benefit payments would have ceased, as **PAZON** was not entitled to them.

B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

7. From on or about February 6, 2003 to on or about August 31, 2007, in the Eastern District of Louisiana, the defendant, **LORETTA PAZON**, did embezzle, steal, purloin, and knowingly convert to her own use, money belonging to the Social Security Administration, a department or agency of the United States, namely survivor benefit payments to which she was

not entitled, having a value of \$16,952.00; all in violation of Title 18, United State Code, Section 641.

A TRUE BILL:

FOR PERSON

JIM LETTEN
United States Attorney
Louisiana Bar Roll Number 8517

JAN MASELLI MANN
First Assistant U.S. Attorney
Louisiana Bar Roll Number 9020

MATTHEW S. CHESTER
Assistant United States Attorney
Texas Bar No. 24045650

New Orleans, Louisiana
July 31, 2009